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12 **AMERICAN CIVIL LIBERTIES UNION OF NEVADA**

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26 *Attorneys for Plaintiff*

27 **UNITED STATES DISTRICT COURT**
28 **DISTRICT OF NEVADA**

29 CHRISTOPHER JONES,

30 Plaintiff,

31 vs.

32 LAS VEGAS METROPOLITAN POLICE
33 DEPARTMENT, a municipal corporation,

34 Defendant.

35 Case No: 2:24-cv-00090-ART-MDC

36 **JOINT STIPULATION TO EXTEND
37 ALL DEADLINES
(FIRST REQUEST)**

38 **SPECIAL SCHEDULING REVIEW
REQUESTED**

39 Plaintiff Christopher Jones (“Plaintiff” or “Jones”) and Defendant Las Vegas Metropolitan

1 Police Department (“Defendant” or “LVMPD”) (collectively the “Parties”), by and through their
 2 respective counsel of record, hereby respectfully submit this Joint Stipulation to Extend all
 3 deadlines by an additional sixty (60) days. This is the first request to extend deadlines in this
 4 matter. The Parties have agreed to the extension for the reasons set forth below:

5 **PROCEDURAL BACKGROUND**

6 Plaintiff filed his Complaint in this case on January 11, 2024. (ECF No. 1.) LVMPD filed
 7 their Answer on February 12, 2024. (ECF No. 8.)

8 On March 15, 2024, the Court entered an order granting the Discovery Plan and Scheduling
 9 Order. (ECF No. 12). Since that time, the parties exchanged Initial Disclosures.

10 **GOOD CAUSE TO EXTEND DISCOVERY**

11 Both parties are actively engaging in discovery and will continue to do so to ensure that
 12 relevant information is obtained and exchanged in a timely manner.

13 The Parties have stipulated and agreed to extend all deadlines by an additional sixty (60)
 14 days as set forth below. In addition to following up on documentation produced, Plaintiff’s primary
 15 counsel, Christopher Peterson, is currently on parental leave until mid-July 2024, and seeks
 16 accommodation for his absence. This extension will ensure that the case continues to progress
 17 smoothly, and to allow both sides to address issues that may arise between them. For these reasons,
 18 this stipulation is made for good cause and not for any improper motive or to cause unnecessary
 19 delay.

20 The Parties hereby stipulate and agree to the following proposed deadlines in this case:

21 Event	22 Existing Deadline	23 Proposed New Deadline
24 Last day to Amend Pleadings	25 May 28, 2024	26 July 29, 2024
27 Expert Disclosures (for party with the burden of proof on the issue)	28 June 27, 2024	August 26, 2024
Rebuttal Expert Disclosures	July 29, 2024	September 27, 2024
Discovery Cutoff	August 26, 2024	October 25, 2024
Dispositive Motion Deadline	September 25, 2024	November 25, 2024

1	Joint Proposed Pretrial Order	October 25, 2024	December 24, 2024
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3 If dispositive motions are filed, the deadline for filing the joint pretrial order will be
4 suspended until 30 days after decision on the dispositive motions or further court order.

5 DATED this 28th day of May, 2024.

5 DATED this 28th day of May, 2024.

6 **DICKINSON WRIGHT PLLC**

7 /s/ John L. Krieger
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6 **KAEMPFER CROWELL**

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19 *Attorneys for Plaintiff Christopher Jones*

22 **IT IS SO ORDERED:**

23
24 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
25 DATED: 5/31/2024
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27
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